

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

HANAN ELATR KHASHOGGI,

Plaintiff,

v.

NSO GROUP TECHNOLOGIES LTD.
and Q CYBER TECHNOLOGIES LTD.,

Defendants.

Case No. 1:23-cv-779-LMB-LRVVAED

Action Filed: June 15, 2023

**DECLARATION OF JOSEPH N. AKROTIRIANAKIS IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

I, Joseph N. Akrotirianakis, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a partner at the law firm of King & Spalding LLP, and I am counsel for Defendants NSO Group Technologies Limited and Q Cyber Technologies Limited (collectively "NSO Defendants") in the above-entitled action and, since February 2020, I have been NSO's lead counsel in other litigation pending in the United States District Court for the Northern District of California. I submit this declaration in support of the NSO Defendants' Motion to Dismiss. Except as otherwise stated, I have personal knowledge of the facts set forth below and could competently testify to each fact averred.

2. On February 21, 2023, King & Spalding LLP applied to the Department of Commerce's Bureau of Industry and Security ("BIS") for a license to export information to the NSO Defendants. The license was intended to permit King & Spalding to discuss the Pegasus software, technology, and related information with the NSO Defendants, as well as similar items and information received from third parties, so that King & Spalding could prepare the NSO Defendants' defense in actions filed against the NSO Defendants in the United States. The application was returned without action on April 20, 2023. King & Spalding's subsequent discussions with BIS have not resulted in a license grant.

3. NSO's e-discovery consultant in another lawsuit filed against the NSO Defendants

in the United States, Deloitte, is represented by separate counsel. Based on my discussions with those counsel, I understand that Deloitte, separately and independently from King & Spalding or the NSO Defendants, on May 26, 2023, applied to BIS for a license that would permit Deloitte to provide the NSO Defendants with industry-standard e-discovery technology that would be required for the NSO Defendants to comply with their discovery obligations. My understanding based on my discussions with Deloitte's counsel is that Deloitte has not yet been able to obtain the requested license from BIS. As of the date of this declaration, that remains the case.

I declare under penalty of perjury that the foregoing is true and correct. Executed September 29, 2023, at Paris, France.

/s/Joseph N. Akrotirianakis
JOSEPH N. AKROTIRIANAKIS